

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DOCKET NO. 04-10781NMG

RANDY L. HANCOCK,)
Plaintiff,)
v.)
PRINCETON PROPERTIES MANAGEMENT, INC.,)
d/b/a PRINCETON PROPERTIES APARTMENTS, and)
CHRISTIAN H. GARGUREVICH,)
Defendants)

**INITIAL DISCLOSURE OF THE DEFENDANT,
PRINCETON PROPERTIES MANAGEMENT, INC.**

The defendant, Princeton Properties Management, Inc., pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rules 26.2(A) of the United States District Court for the District Court of Massachusetts, hereby discloses the following:

A. The defendant believes that the following individuals, in addition to those previously disclosed by the plaintiff, may have discoverable information that the defendant may use to support its claims and defenses:

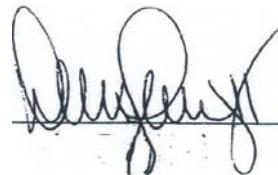
1. Roland Fong
R & R Lawn Maintenance
41 Nightingale Rd.
Nashua, New Hampshire 03063
603.889.0856
2. Lisa Parker
Assistant Property Manager
678 Princeton Blvd, Suite 14
Lowell, MA 01851
3. Kurt Shillington
c/o Princeton Properties
678 Princeton Blvd
Lowell, MA 01851

B. The defendant may support its claims and defenses with the following documents, in addition to those listed by the plaintiff. Complete weather records and color copies of photographs are not yet in the possession of defense counsel. Copies of all other documents are produced to opposing counsel with this Disclosure.

Documents

1. Princeton Properties Management, Inc Snow Removal Contract;
2. Invoices dated 12/31/03 and 1/31/04 from R & R Lawn Maintenance;
3. Contractor Snow Removal Log dated 2/10/04;
4. General Liability Incident Report Form dated 2/11/04
5. Photographs of the subject location;
6. Weather Records for the period in question.

Respectfully submitted,
The Defendant,
Princeton Properties Management, Inc.,
By its Attorney,



Denise Lauretti
BBO# 550899
Horn & Lauretti
225 Friend Street, Suite 203
Boston, MA 02114
(617) 589-3000

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s) of record for each party by mail on 9 August 2004



Denise Lauretti